

September 26, 2012

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554 Austin, TX 5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544

Fax: 512.343.0119

RE:

Filing of Seneca Telephone Company in Compliance with Order Designating Issues for Investigation, In the Matter of Investigation of Certain 2012 Annual Access Tariffs, WC Docket No. 12-233, WCB/Pricing No. 12-09

REQUEST FOR CONFIDENTIAL TREATMENT

Dear Ms. Dortch:

Enclosed for filing in the above-referenced dockets is the Compliance Filing of Seneca Telephone Company (Seneca).

Pursuant to the Protective Order in this proceeding, Seneca requests confidential treatment of parts of its information and its schedules that contain confidential and proprietary information related to Seneca's finances, including subscriber information, revenues by service type and other sensitive financial data. This information is entitled to confidential, non-public treatment under the Freedom of Information Act, the related provisions of the Commission's rules and the Protective Order in this proceeding.

Seneca has marked each page of the non-redacted version of this filing with the legend "CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO. 12.233, WCB/PRICING NO. 12-09 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION." Seneca has filed redacted versions of each Stamped Confidential Document in the Commission's Electronic Comment Filing System (ECFS) and has emailed the unredacted schedules to Ms. Robin Cohn, Pricing Policy Division, Wireline Competition Bureau.

Thank you for your attention to this matter.

Sincerely,

Gail Odell

Authorized Representative Seneca Telephone Company

GO/pjf

Enclosures

Seneca Telephone Company Description and Justification September 27, 2012

## I. Interstate Switched Access Service

#### Issue A. Calculation of Base Period Revenue

In accordance with §51.917(c), Seneca calculated its interstate Base Period Revenue based upon its 2011 Interstate Switched Access Revenue Requirement of \$ contained in its July 1, 2011 interstate access tariff filing with the FCC. Included in this amount is \$ contained of Local Switching Support (LSS).

#### Issue C. Interstate Switched Access Demand

For Test Year (TY) 2012-13, forecasted interstate switched access demand was calculated using an annualized demand loss factor of 15% applied to the FY2011 demand units.

#### II. Transitional Intrastate Switched Access Service

#### Issue A. Calculation of Base Period Revenue

# 1. Jurisdiction and Directionality

Seneca's Carrier Access Billing System (CABS) assigns each Access Usage Record (AUR) to the interstate or intrastate jurisdiction utilizing the "From" and "To" number field in the AUR. For terminating AURs without a "From" number, this access usage is allocated to the interstate and intrastate jurisdictions based on the interexchange carrier's provided Percent Interstate Usage (PIU) factor. Seneca's CABS assigns each AUR as either originating or terminating based on the directionality field in the AUR.

For Fiscal Year (FY) 2011, terminating intrastate usage was accumulated for the billing cycle and then billed at the following intrastate switched access rate elements:

Terminating Carrier Common Line, including Orig. 800 minutes billed at the Term. CCL rate

Terminating Local Switching

Terminating Information Surcharge

**Terminating Local Transport** 

The FY2011 terminating intrastate base period data included only the demand and revenue generated by the rate elements listed above. There were no intrastate switched access non-recurring charges billed during the FY2011 billing period. No late payment fees or other non-service related charges were included in the FY2011 billing period data.

## 2. FY2011 (October 1, 2010 to September 30, 2011) Usage Period

Seneca's monthly CABS processing bills switched access usage in arrears in one billing cycle during each month. There is approximately a 15 day lag for the usage period in each billing cycle.

Seneca Telephone Company Description and Justification September 27, 2012

For example, the November 1, 2010 CABS bills included usage for September 16, 2010 to October 15, 2010. Seneca extracted all switched access usage billed from November 1, 2010 through October 1, 2011 to insure that a full 12 months of usage data was reported for the FY2011 billing period with usage dates of September 16, 2010 through September 15, 2011. Seneca did not bill or include any out-of-period billing adjustments during this 12 month FY2011 billing period. The total transitional intrastate demand and revenue for the September 16, 2010 through September 15, 2011 usage period was minutes and \$ minutes and \$ minutes.

Per the FCC's request, Seneca undertook the following billing cycle adjustments to revise the original annual usage period to match the exact usage dates of October 1, 2010 through September 30, 2011. First, Seneca extracted and identified the CABS demand and revenue associated with the September 16, 2010 through September 30, 2010 usage period as minutes and sin revenue. This data was deducted from the annual total to adjust out the FY2010 usage period.

Next, using data from the November 1, 2011 CABS bills, Seneca extracted and identified the CABS demand and revenue associated with the September 16, 2011 through September 30, 2011 usage period as minutes and \$\frac{1}{2}\$ in revenue. This data was added to the annual total to complete the FY2011 usage period.

Consequently, the billing cycle adjustments decreased the total FY2011 October 1, 2010 through September 30, 2011 usage period data to minutes and \$ in revenue. The billing cycle adjustments represent a net decrease in billed revenue of \$ or a .31% decrease over the original 12 month billing cycle total.

## 3. March 31, 2012 Cutoff / Uncollected Revenue

Seneca reviewed its CABS Accounts Receivable reports as of April 1, 2012 and determined that it had \$0 in uncollected revenues for terminating intrastate switched access charges billed during the FY2011 billing period. Consequently, all FY 2011 intrastate terminating billed revenue was received by March 31, 2012.

## Issue B. Intrastate Rate Reductions

In accordance with §51.909(b), Seneca reduced its transitional intrastate switched access rates by 50% of the differential between the FY2011 terminating intrastate demand priced at 12-29-11 intrastate switched access rates compared to the FY2011 terminating intrastate demand priced at 12-29-11 interstate switched access rates. Utilizing the option in §51.909(b)(2)(v), Seneca elected to adopt the interstate rate structure and 12-29-11 interstate rate levels and include the transitional per-minute charge assessed on terminating intrastate end office switching minutes between July 3, 2012 and July 1, 2013. This revenue reduction and rate restructure was reflected in its revised intrastate switched access tariff which was approved by the Missouri Public Service Commission effective July 3, 2012.

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These calculations were performed at the rate element level and no composite rates were used. Since no intrastate switched access non-recurring charges were billed in the FY2011 billing period, no non-recurring revenues or demand were included in the calculations.

Since Seneca's intrastate switched access tariff included non-LTR transport rate elements and its interstate switched access tariff included LTR transport rate elements, the actual FY2011 non-LTR demand units had to be converted to theoretical LTR demand units based on the relationship of the interstate end office demand units compared to the LTR demand units as of the December 2011 billing month.

Utilizing the FY2011 terminating intrastate data, adjusted for the FCC's required billing cycle adjustment, the revised FY2011 data generates an increase in the terminating intrastate FCC Transitional Charge from the initial rate of \$0.033263 to a corrected rate of \$0.033260. Seneca will file the corrected rate with the MOPSC as soon as possible.

#### Issue C. Intrastate Switched Access Demand

For Test Year (TY) 2012-13, forecasted terminating intrastate switched access demand was calculated using an annualized demand loss factor of 15% applied to the FY2011 demand units. Subsequently, the forecasted terminating intrastate switched access demand was allocated as 90% non-VoIP traffic to be rated at intrastate rate levels and 10% VoIP traffic to be rated at interstate rate levels. The terminating intrastate VoIP minutes are reflected as a 10% reduction to the forecasted terminating intrastate switched access demand applicable to the FCC Transitional Charge rate element, since terminating intrastate VoIP minutes would not be billed this rate element. All other intrastate per-minute switched access rate elements would be applicable to the VoIP minutes since the revised terminating intrastate rate levels are equal to Seneca's interstate rate levels.

## III. Reciprocal Compensation

## Issue A. Calculation of Base Period Revenue

In accordance with §51.917(c), Seneca's FY2011 Reciprocal Compensation revenue includes only those revenues received by March 31, 2012 for terminating intraMTA usage from CMRS providers between October 1, 2010 and September 30, 2011. These revenues for intraMTA usage were based upon the following single reciprocal compensation rate element:

## Local Transport and Termination

Seneca bills terminating intraMTA usage in the same manner as described above in Intrastate Issue A item 2. The total terminating intraMTA demand and revenue for the September 16, 2010 through September 15, 2011 usage period was minutes and \$ in revenue. The deduction for the September 16, 2010 through September 30, 2010 usage period was minutes and \$ in revenue. The addition for the September 16, 2011 through September 30,

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2011 usage period was minutes and \$ in revenue. The billing cycle adjustments decreased the total FY2011 October 1, 2010 through September 30, 2011 usage period data to minutes and \$ in revenue.

During FY2011, since all invoices to Halo Wireless remained unpaid as of March 31, 2012, Seneca's reported FY2011 data does not include any revenue or billed minutes for Halo Wireless.

Since all of Seneca's Wireless Interconnection Agreements included a "Change in Law" provision, the exchange of all intraMTA traffic with CMRS providers moved to Bill and Keep effective July 1, 2012.

Seneca does not have any Interconnection Agreements with non-CMRS providers; and, therefore, does not have any non-CMRS data to report for FY2011 or TY 2012-13.

## IV. Access Recovery Charge (ARC)

#### Issue E. Calculation of ARC Rates

Since Seneca's Total TY 2012-13 Eligible Recovery amount, as adjusted in this filing, exceeds the amount of projected ARC revenues, based on its ARC rates as originally filed, Seneca believes that its proposed ARC rates are just and reasonable and no refund obligation exists.

Table 1: - Access Recovery Charge (ARC)	ARC Rates as Filed Effective 7/3/2012	ARC Rates Supported by Direct Case
Residence – Individual Line	\$0.50	\$0.50
Business - Single Line	\$0.50	\$0.50
Business – Multiline	\$1.00	\$1.00

## TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

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i certify that I am an officer of the the state jurisdiction for any Eligib					ing dupilcative recovery in
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#### TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

# Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has compiled with Eligible Recovery 551.917(d) and Access Recovery Charge \$51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f). Name of Reporting Camer SENECA TELEPHONE COMPANY 9/26/2012 Date Signature of authorized office W. JAY METCHELL PRESIDENT Telephone number of authorized officer: (417) 776-2247. 421945 Filing Due Date for this form 9/27/2012 Study Area Code of Reporting Carrier (mm/dd/yyyy) Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1801.

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Filing Date (enter w/leading '):

9/27/2012

**Holding Company:** 

Seneca Telephone Company

Transmittal Number

Eligible Revenue - Current Yr Recovery



Maximum ARC opportunity Revenue	
Maximum CAF ICC Support	
Residential Rate Ceiling: ( 51.915(b)(12) )	\$ 30.00
Maximum MLB SLC+ARC: ( 51.915(e)(5)(iv) )	\$ 12.20
Max ARC for current year: Res/SLB	\$ 0.50
Max ARC for current year: MLB	\$ 1.00

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Seneca Telephone Company

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#### **REDACTED - FOR PUBLIC INSPECTION**

Holding Company Eligible Recovery	Holding Company Maximum ARC Revenues	Maximum CAF ICC Support

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**Holding Company:** 

Seneca Telephone Company

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FOOTNOTES:

# **Data Sheet**

Standalone R1 rate was in effect as of June 1, 2012.

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ne rate elea		17.2.1(G)	(17.2.1(E)	(17.2.1(0)	17.2.1(0)	17.2.1(A)	17.2.1(A)	17.2.1(A)	172.1(A)	17.2.1			17.2.2	17.2.2						1	******			17.2.2		17.2.2	17.2.2	17.2.2	177	2				17.2.3				M/M	11/2.3	1 1 3 3			N/A		in par	The state of	Interstate  Interstate  Interstate		013 intrasta	2011 Actua 013 Expecte	5		mben	Ì
ent per line		-						1			T		N/A	N/A	1					+		T		N/A		N/A	N/A	N/A	N/A	X/X	1	Ī	T	N/A				17/73	N/A				N/A	1	and a	ngu.			te Eligible R	Revenue fo		421945	Seneca Te	Septembe
Total  Note 1: Enter one rate element per line under the relevant category, Insert rows as necessary,	The second secon	Flexible ANI	Trunk Activation	FGC and FGD Conversion of MF Signaling to SS7 Signaling	Interim NXX Translation Per Order, per Lata or Market Area	- High Capacity DS3	· High Capacity DS1	- Voice Grade Four Wife	- Voice Grade Two Wire	"Nonrecurring Charges""		The state of the s	Direct Touriked Termination	Direct Trunked Facility	Originating and Terminating Direct-Frunked Transport	and the second s	Originating and Terminating Tandem-Switched Dedicated Transport	The first of the f		Originating and Terminating Entrance Facilities	** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **		A STATE OF THE PROPERTY OF THE	Tandem Switching	Terminating Tandem Switching	Tandem Switched Termination (Host to Tandem)	Tandem Switched Facility (Host to Tandem)	Tandem Switched Termination (Remote to Host)	Tandam Strikehol Realist (Demonts to Enet)	Testing UK, Middle Serious Commission Constitution	** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **			Information Surcharge	Interconnection Changes)	Terminating Other (e.g., information surcharge, Transport or Residual		CC 1 distributed Citates	Local Switching	Terminating Local Switching		1 1	Carriey Common Line - Terminating	Ş	** TERMINATING END OFFICE ACCESS SERVICE **	anut (Note 1)	Intrastate and Interstate Switched Access Rate Elements for Transitional		ecovery	1978 In 7011 Actual relevant for Transitional Intrastate Access Service Nate Elements 18 95% of Total Fy 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements 19 Total TV 2012-2013 Expected Maximum Transitional Intrastate Access Service Revenue				September 27, 2012
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1		September 27, 20	012	·	<u></u>			i	<del>                                     </del>	<u> </u>	<u> </u>	<u> </u>	1 1/1		
2	_	Seneca Telephon			REDACTED	- FOR PUBLIC I	NSPECTION								
3	Transmittal Number:	·	, ,												
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	TY 2012-2013 Reciprocal Compensation E			O20											
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9	TY 2012-2013 Net Reciprocal Compensation	on Eligible Reco	very	E7-E8	Same of State of Stat										
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13	Reciprocal	Compensation	·			nt Interstate A				rocal Comp	ensation Rat	e and Eligible	Recovery (	Calculations	<del></del>
1			T .						Price Out				1		T
1	į		}	i 1				<b>\</b>	with July		1		1	<u> </u>	TY 2012-
			1						1, 2012				TY 2012-		2013 Rec.
					FY 2011	FY 2011	FY 2011		Average Rates and			TY 2012-2013		95% of FY	Comp. Eligible
1	77	FY 2011	İ	FY 2011	Terminating	Terminating	Average	July 1, 2012	FY 2011	Revenue	% Revenue		Expected	2011	Recovery
14	Revenue Category (Note 1)	Revenue	FY 2011 MOU	Average Rate	Revenue	MOU	Rate	Average Rate	Units	Difference	Difference	Demand	Revenue	Revenue	Revenue
15	\	Input	Input	B/C	Input	[nput	E/F	(D-G)/2+G or D	H*C	B-1	(J/B)*100	Input	H*L	.95*B	N-M
1	End Office Switching			0.000000			0.000000	0.00000	_	C			0	C	0
-	Tandem Switching			0.000000	:		0.000000	0.000000	0	C			0	0	0
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22															
23		TY 2012-2013	Reciprocal Co	ompensation El	ligible Recovery	Expense Cale	culations				1				
$\Box$										TY 2012-	1				
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	\		<b>\</b>	\		TY 2012	2012	TY 2012-2013	95% of FY	Comp. Eligible	1				
		FY 2011	1	FY 2011	% Revenue	Average	Expected	Expected	2011	Recovery					
24	Expense Category		FY 2011 MOU	Average Rate	Difference	Rate	MOU	Expense	Expense	Expense	1				
25	<b></b>	Input	Input	B/C	K20	D*(1-E)	Input	F*G	.95*B	I-H	]				
	Total Expense	0	0	0.000000	0.00%	0.000000	0	0	0	C					
27 28															
	Note 1: Use rows 16, 17, and 18 for traffic ca	arried nursuant to	reciprocal com	nensation acree	ments that speci	fv senarate rate	es for end offic	e switching, tend	em switching	ı. and commo	n transport				
	Use row 19 for traffic carried pursuant to reci									,					

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Filing Date (enter w/leading '): Holding Company: Transmittal Number:

9/27/2012 Seneca Telephone Company

**REDACTED - FOR PUBLIC INSPECTION** 

ARCRCTRP-CAF-1

Federal SLC-MLB

9.20

EXCHANGES Study Area 421945 Tiff City 421945 Seneca

			Rate C	Ceilin	g Compo	nent	Charg	es Ca	lculati	on ( 51.915(l	)(11) )				3		
VIII.				RES	SIDENCE	/ NP	/ BRI /	SLB	excluc	ling Lifeline)							TI-LINE BUSINESS
Res / NP / BRI	SLB					Man	datory	,							Total Rate	nonCentrex	Centrex
Tariff Period	Tariff Period	Stan	id-alone	Ma	ndatory	Z	one	!	State			State	Fee	deral	Ceiling	Tariff Period	Tariff Period
Projected Lines	<b>Projected Lines</b>	<u>R</u>	1 rate		<u>EAS</u>	<u>Ch</u>	irges		SLC	<u>E911</u>	TRS	USF	° ≈	LC	Comp. Chgs	<u>Projected Lines</u>	Projected Lines
		\$	10.00	\$	-	\$	-	\$	-	\$0.0	0 \$0.1	.1 \$0	).04	\$6.50	\$16.65		
. 11 154. 11. 1 12.01	<u> Albania di /u>	\$	10.00	\$	-	\$	-	\$	-	\$0.€	9 \$0.1	.1 \$€	0.09	\$6.50	\$16.79		

Filing Date (enter w/leading '): **Holding Company:** 

Transmittal Number:

9/27/2012

Seneca Telephone Company

**REDACTED - FOR PUBLIC INSPECTION** 

Eligible Revenue - Current Yr Recovery Maximum Imputed ARC Revenue Tariffed ARC Revenue Expected CAF ICC Support

Eligible Revenue - Current Yr Recovery Tariffed ARC Revenue + Expected CAF ICC Support

Residential Rate Ceiling: ( \$1.915(b)(12) ) 30.00 Maximum MLB SLC+ARC ( \$1.915(e)(5)(iv) ) 12.20 Max ARC for current year: Res/SLB 0.50 Max ARC for current year: MLB 1.00

Totals	a samula de la companya de la compa			interference of the second	
Exchange/RG	RESIDENCE / NP / BRI / SLB (excluding Lifeline)		MULTI-LINE BUSINESS		
	Res/NP/BRI SLB Residential RES/NP	/BRI Current Year SLB ARC Revenue	NonCentrex Centrex MLB MLB Curr. Yr.	NonCentrex Centrex ARC Revenue	
	Tariff Period Tariff Period Total Rate Maximum	Tariffed Tariffed at Tariffed	Fariff Period Tariff Period Federal Maximum	Tariffed Tariffed at Tariffed	
	Projected Lines Projected Lines Ceiling Chgs ARC Rate	ARC Rate ARC Rate Rate	Projected Lines Projected Lines <u>SLC</u> <u>ARC Rate</u>	ARC Rate ARC Rate Rate	
Tiff City	\$ 10.00 \$	8.50 \$ 0.50 \$ 0.50 <b>3</b>	\$ 9.20 \$ 1.00	\$ 1.00 \$ 1.00	
Seneca	\$ 10.00 \$	0.50 \$ 0.50 \$ 0.50	\$ 9.20 \$ 1.00	\$ 1.00 \$ 1.00	

ARCRCTRP-CAF-Z

Filing Date (enter w/leading '):

9/27/2012

**Holding Company:** 

Seneca Telephone Company

**Transmittal Number:** 

ARCRCTRP-CAF-3
REDACTED - FOR PUBLIC INSPECTION

FOOTNOTES:

## **Data Sheet**

Standalone R1 rate was in effect as of June 1, 2012.